

EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN PROGRAM BUREAU, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

UNITED STATES OF AMERICA

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant.

Case No. 1:20-mc-91250

This Document Relates To:
Civil Action No. 1:19-cv-01197-LO-TCB
in the United States District Court for the
Eastern District of Virginia

DECLARATION OF ROBERT P. WALKER

I, ROBERT P. WALKER, being over the age of eighteen years and otherwise competent to make this declaration, declare that the following is based on my personal knowledge and is true and correct:

1. I am the President and Chief Executive Officer of American Program Bureau, Inc., a corporation organized under the laws of the Commonwealth of Massachusetts with its principal offices located at One Gateway Center, Suite 751, Newton, MA 02458 (“APB”).
2. Attached to this Declaration is a spreadsheet, consisting of three (3) pages under the caption “Edward Snowden Speaking Engagements 2015 – 2020” (the “ES Spreadsheet”) that

was prepared by the Vice President and Controller of APB who reports directly to me as President and Chief Executive Officer.

3. In my capacity as Chief Executive Officer of APB, I am responsible for and familiar with the accounting and financial activity of APB and for the books and records maintained by the company in the ordinary course of business.

4. The ES Spreadsheet reflects a total of sixty-seven (67) individual speaking engagements booked by APB directly, or through its affiliate Open Mic Management, for Edward Snowden between September 16, 2015 and May 19, 2020 which constitute all of such engagements booked for Edward Snowden by or through APB (including through Open Mic Management).

5. With respect to each speaking engagement, the ES Spreadsheet provides (a) the date of the engagement, (b) the name of the party responsible for the engagement (the “APB Client”), (c) the amount paid to APB or Open Mic Management pursuant to the contract executed for each engagement, (d) the “speaker honorarium” reflecting the amount payable to Edward Snowden, (e) the commission payable to APB or Open Mic Management and (f) the geographic location of each engagement.

6. Each of the entries on the ES Spreadsheet were made at or near the time of the event or activity reflected therein.

7. The ES Spreadsheet and all entries reflected therein were made by – or from information transmitted by – myself or another employee of APB working under my supervision with personal knowledge of the content thereof and who reported such knowledge in the ordinary course of business.

8. The ES Spreadsheet and all entries reflected therein are of the kind routinely made and kept in the regular course of business by APB.

9. The ES Spreadsheet and all entries reflected therein were in the regular course of business activity by APB.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Robert P. Walker

Dated this 25 day of June, 2020.

EDWARD SNOWDEN SPEAKING ENGAGEMENTS 2015-2020

<u>Event date</u>	<u>Contract</u>	<u>Client</u>	<u>Gross</u>	<u>Speaker honorarium</u>	<u>APB Net</u>	<u>Moderator</u>	<u>Location</u>
09/16/15	64466	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Hong Kong
09/28/15	64655	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Iowa City IA
10/08/15	64631	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Nürnberg
11/03/15	64449	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Sherbrooke QC
11/12/15	65001	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Kingston
12/05/15	64478	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Park City UT
02/16/16	64623	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Boulder CO
02/17/16	64825	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Baltimore MD
03/16/16	65297	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Rust
03/25/16	65527	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Tucson AZ
04/05/16	64556	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Vancouver B.C.
05/12/16	65728	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Zurich
06/01/16	66455	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Berlin
06/28/16	66569	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Roskilde
09/28/16	66088	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Delaware OH
09/29/16	66709	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	TBD
10/05/16	64894	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Washington DC
10/13/16	66134	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Newport Beach CA
10/17/16	65927	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Carefree AZ
10/18/16	64682	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Toronto ON
11/02/16	66510	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Montreal QC
11/15/16	67706	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Oakland CA
11/30/16	67035	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Columbus OH
01/09/17	67713	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Waterloo ON
01/18/17	68051	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Toronto ON
01/19/17	66664	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		San Diego CA
02/01/17	67694	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Pittsburgh PA
02/16/17	68205	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Newport Beach CA
03/16/17	67539	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Middlebury VT
03/21/17	67905	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Hannover
03/22/17	67574	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Stockholm
05/09/17	68831	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Winnipeg
05/15/17	68516	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Washington DC
05/22/17	68466	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Los Angeles CA
05/30/17	68012	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Estoril
08/16/17	69592	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Mexico City

08/22/17	69477	[REDACTED]	[REDACTED]	[REDACTED]	Edmonton	AB
09/09/17	67842	[REDACTED]	[REDACTED]	[REDACTED]	Indianapolis	IN
09/11/17	69286	[REDACTED]	[REDACTED]	[REDACTED]	Philadelphia	PA
09/16/17	68304	[REDACTED]	[REDACTED]	[REDACTED]	St. Louis	MO
10/06/17	67378	[REDACTED]	[REDACTED]	[REDACTED]	Stockholm	
10/24/17	70127	[REDACTED]	[REDACTED]	[REDACTED]	Dublin	
11/08/17	69839	[REDACTED]	[REDACTED]	[REDACTED]	San Francisco	CA
11/13/17	69007	[REDACTED]	[REDACTED]	[REDACTED]	Hamburg	
11/21/17	70290	[REDACTED]	[REDACTED]	[REDACTED]	Istanbul	
01/29/18	70692	[REDACTED]	[REDACTED]	[REDACTED]	New Orleans	LA
03/02/18	70182	[REDACTED]	[REDACTED]	[REDACTED]	Berlin	
03/14/18	68812	[REDACTED]	[REDACTED]	[REDACTED]	Sydney	
03/15/18	71528	[REDACTED]	[REDACTED]	[REDACTED]	Rust	
03/16/18	70331	[REDACTED]	[REDACTED]	[REDACTED]	Rottach-Egern	
03/27/18	70122	[REDACTED]	[REDACTED]	[REDACTED]	Camrose	AB
08/22/18	71660	[REDACTED]	[REDACTED]	[REDACTED]	Sao Paulo	
09/12/18	70797	[REDACTED]	[REDACTED]	[REDACTED]	Chicago	IL
10/24/18	70139	[REDACTED]	[REDACTED]	[REDACTED]	Dublin	
11/06/18	72172	[REDACTED]	[REDACTED]	[REDACTED]	Tel Aviv	
11/08/18	70701	[REDACTED]	[REDACTED]	[REDACTED]	Austin	TX
11/29/18	73019	[REDACTED]	[REDACTED]	[REDACTED]	London	
03/19/19	73047	[REDACTED]	[REDACTED]	[REDACTED]	London	
05/15/19	72973	[REDACTED]	[REDACTED]	[REDACTED]	Las Vegas	NV
06/26/19	74636	[REDACTED]	[REDACTED]	[REDACTED]	San Francisco	CA
08/20/19	74728	[REDACTED]	[REDACTED]	[REDACTED]	Berlin	
09/11/19	73332	[REDACTED]	[REDACTED]	[REDACTED]	Columbus	OH
09/12/19	73425	[REDACTED]	[REDACTED]	[REDACTED]	Columbus	OH
11/29/19	76106	[REDACTED]	[REDACTED]	[REDACTED]	California	
12/02/19	74197	[REDACTED]	[REDACTED]	[REDACTED]	Toronto	ON
01/27/20	76220	[REDACTED]	[REDACTED]	[REDACTED]	Ecublens	
05/19/20	77113	[REDACTED]	[REDACTED]	[REDACTED]	Cologne	

A variance in the amount of \$185,200 exists with respect to the aggregate value of the income reported on the Forms 1099 issued to Mr. Snowden for the relevant reporting periods plus the honoraria for 2020, and the sum of the total reported speaker honoraria. APB cannot locate in its records a Form 1099 issued to Mr. Snowden for 2015. Additionally, an internal APB email attachment indicates that a contribution to the Freedom of the Press Foundation made at the request of Mr. Snowden before November 2017 accounts for \$35,000 of this variance. Together the honoraria reportedly earned in 2015 (\$134,000) and the \$35,000 contribution account for \$169,000 of the variance. The remaining \$16,200 is believed to also have been distributed as one or more charitable contributions at Mr. Snowden's request, although documentation to support that conclusion cannot be located. This spreadsheet was prepared by the Vice President and Controller of American Program Bureau, Inc.